

MAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	
)	07 CR 794
GEORGE KONJUCH)	
ARMANDO NAVARRETE and)	
NAVARRETE INDUSTRIES, INC.,)	
d/b/a "Integrated Security Solutions" and "INS")	

F I L E D

1-18-2008
JAN 18 2008 LM

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

TO: Patrick J. Fitzgerald
Brandon D. Fox
United States Attorney, Northern District of Illinois
Everett McKinley Dirksen Federal Building
219 South Dearborn Street, Fifth Floor
Chicago, Illinois 60604

Please take notice that on January 18, 2008, I filed with the United States District Court, Northern District of Illinois, Eastern Division **DEFENDANT NAVARRETE INDUSTRIES, INC.'S FIRST REQUEST FOR DISCOVERY**, a true and correct copy of which is attached hereto and herewith served upon you.

CERTIFICATE OF SERVICE

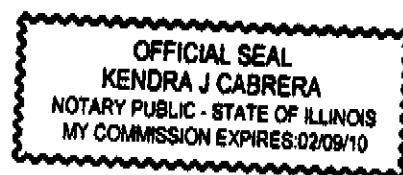
I, Ricardo Hidalgo, Jr., a non-attorney, on oath state:

I served this Notice of Motion and the above referenced Request for Discovery by mailing a copy via Regular U.S. Mail to the above mentioned addresses; by depositing the same in the U.S. Mail at 222 N. LaSalle St, Chicago, IL by 5:00 p.m. on January 18, 2008, with proper postage prepaid.

Signed and sworn to before me January 18, 2008

NOTARY PUBLIC

Law Offices of Gemma B. Dixon
Attorney for Defendant Navarrete Industries, Inc.
222 N. LaSalle Street, Suite 2160
Chicago, Illinois 60601
312-658-0100
Atty. No.: 37838



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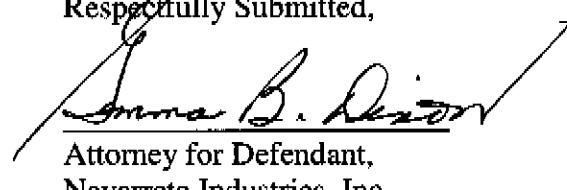
DEFENDANT NAVARRETE INDUSTRIES, INC.'S
FIRST REQUEST FOR DISCOVERY

PLEASE TAKE NOTICE that Defendant NAVARRETE INDUSTRIES, INC.
(hereinafter "Navarrete Industries"), by and through its attorneys, the LAW OFFICES OF
GEMMA B. DIXON, pursuant to Rule 16(a)(1) of the Federal Rules of Criminal Procedure,
requests discovery and inspection of the following information, evidence, and materials at the
Law Offices of Gemma B. Dixon, 222 North La Salle Street, Suite 2160, Chicago, Illinois
60601:

1. The substance of any oral statements made by Navarrete Industries, as described in Rule 16 (a)(1)(C), in response to interrogation by a government agent that the government intends to use at trial.
2. Any written or recorded statements made by Navarrete Industries, as described in Rule 16 (a)(1)(C), in response to interrogation by government agents

3. Documents and tangible objects in the possession, custody, or control of the government that are material to preparing a defense or that the government intends to use in its case-in-chief or that were obtained from or belong to Navarrete Industries.
4. Examinations and test reports that are in the possession, custody, or control of the government and are material to the defense or are intended for use in the government's case-in-chief.
5. Written summaries of expert testimony that the government intends to use during its case-in-chief.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Gemma B. Dixon". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Attorney for Defendant,
Navarrete Industries, Inc.

Law Offices of Gemma B. Dixon
Attorney for Defendant Navarrete Industries, Inc.
222 North La Salle Street, Suite 2160
Chicago, Illinois 60601
(312) 658-0100
Attorney No. 37838